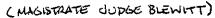
## MI THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JASON & BENSON DURAN, et al

CIVIL ACTION NO: 1: CV -00 -1229

( JUDGE CALDWELL)





PLAINTHES REQUEST TO ADD SUPPLEMENTAL COMPLAINT AGAINST ALAN S. GOLD, ESO, SEAN ROBINS, ESO. ALAN BUTKOVITZ, ESO., AND THE LAW FIRM OF GOLD, BUTKOVITZ, AND ROBINS, P.C.

Plaintiff respectfully requests this Court to allow him to file a suplemental complaint against Alan S. Gold, Esq., Sean Robins, Esq., and Alan Butkovitz, Esq. and the law firm of Gold, Butkovitz, and Robins, P.C., in accordance to Fed. R. Civ. P. 15 (d)

D As previously addressed to this Court in Plaintiffs Motion For Discovery Albuse and Violations of Professional Conduct date December 4, Zoor, the above mentiones individuals and law firm did send Plaintiff's confidential medical psychiatric records to Joseph Dyson (CA-8143), an inmote at S. C.I. Smithfield, Mr. Dyson is not affiliated with this case, nor is he on associate of the Plaintiffin any way.

2) The casual, unjustified dissemenation of confidential medical information to non-medical staff acather prisoners is unconstitutional. See Woods v. White 689 F. Supp at 877

3) The plaintiff has enclosed a copy of his intended Supplemental Complaint

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JASON E. BENSON

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CLIVIL ALTTON NO: 1: CV-c0-1229

LURAN, et al

CMagistrate Judge Blewitt

PLAINTIFFS SUPPLEMENTAL COMPLAINT AGAINST ALAN S. GOLD, ESQ,

SEAN ROBINS, ESQ, ALAN BUTKOVITZ, ESD., AND THE LAW FIRM OF GOLD, BUTKOVITZ, ESD., AND THE LAW FIRM OF GOLD, BUTKOVITZ, ESD., AND THE LAW FIRM OF GOLD, BUTKOVITZ, US.

L) Since the beginning of litigation the Plaintiff has requested defendant Ellier course! (Sean Robins, Esq., Alan Gold, Esq., Alan Butkovitz, and the law firm of Gold, Butkov and Robins, P.C.) to provide plaintiff with copies of his medical (psychiatric file.

2) Course! has repeatedly cleaned Plaintiff copies of his medical records, stating that the

medical file (See Exhibit "A")

3) Despite counsels assertion that they cannot legally produce copies of plaintiff

medical/psychiatric records to him, they did provide copies of plaintiffs confidential

medical records to doseph Dyson (CA-BH3), a prisoner at S.C.I. Smithfield, Inmate

are not and have never been, the custodian of his medical records, and, as such, the

chent does not have the authority, legal or otherwise, to produce a copy of plaintif

Dyson is not affiliated with this case, nor is he associated with the plaintiff in an may Dyson recieved Plaintiffs medical/psychiatric records as Nevember 28,2001. Or Nevember 30,7001 Dyson wrote and signed an affadavit confirming that he did in fac

recieve plaintiffs confidential medical/psychiatric records from the law firm of

Gold, Buttovitz, and Robins, P.C. (See Exhibit "A" of Plaintiffs Motion for Discovery About Violations of Professional Conduct)

e casual, unjustified dissemenation of confidential medical information to nonal staff and other prisoners is unconstitutional. Counsel, in so / a plaint

WHEREFORE, Plaintiff requests this court grant the following relief!
A.) Award Compensatory damages in the following amounts:
1.) \$2,000,000.00 juintly and severally against Alan Gold, Esq., and
Alan Butkavitz, Esq.
2.) \$1,000,000.00 against Sean Robins, Esq
3)*5,000,000.00 against the law firm of Gold, Butkovitz & Robins, R.C.
B) Award Punitive damages in the following amounts:
B) Award Punitive damages in the following amounts:  1.) 2,000,000.00 against Alan Gold, Fig., and Alan Butkovitz, Esq.
2.) 1,000,000.00 against Sean Robins, Esq
3.) 5,000,000.00 against the law firm of Gold, Butkovitz ; Robins, P.C.

- i) The actions of Alan Gold, Esq., Alan Butkovitz, Esq., Sean Robins, Esq., and the law firm of Gold, Butkovitz, and Robins, P.C. in violation of plaintiffs Constitutional right to privacy, did release plaintiffs confidential medical and psychiatric records to a state prisoner
- 2) Herein, for the violations aforementioned plaintiff reguests that the above mentioned defendants be brought up on charge before the Disciplinary Board.
- 3.) That above mentioned defendants be constructed on how to bandle confidential information
- 4) That the defendants award plaintiff damages in the amount of \$10,000,000.00 \$ a\$5,000,000.00 jointly
  - 3 b \$ 2,000,000.00 from Gold; \$2,100,000.00 from Butkovitz;
  - \$ 1,000,000,00 from Robins

	CERTIFICATE OF SERVICE  1, Jason E. Benson, Plaintiff, hereby certify that a
	true and complete document to this Court and was
	served by First Class Mail in a prepaid enveloped
	server by the part of the part
	his Ser
	Jason t. Benson, DSG483
	S.C.I. Smithfield
	P.O. Box 999, 1120 Pike St
	Huntingden, PA 1665Z
	January M, 2002
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